

ID No. 4032065

6th June 2012

Matter 22

**SOUTH GLOUCESTERSHIRE CORE STRATEGY
– EXAMINATION HEARING**

**STATEMENT ON BEHALF OF PERSIMMON
HOMES, ASHFIELD LAND AND CHARLTON
ESTATES**

MATTER 22

JUNE 2012

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TA Ref:	PERA2009
LPA Ref:	SGC
Office Address:	10 Queen Square Bristol BS1 4NT
Telephone	0117 989 7000
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Introduction

- 1.1 The following Statements have been prepared by Turley Associates on behalf of **Persimmon Homes, Ashfield Land** and **Charlton Estates**, who control land at Wyck Beck Road/Fishpool Hill which is part of the proposed Cribbs/Patchway New Neighbourhood.
- 1.2 Representations to the Draft Core Strategy (and subsequent proposed changes) were previously submitted by Turley Associates on behalf of **Persimmon Homes** and **Ashfield Land** (incorporating Charlton Estates). Turley Associates are instructed to progress these representations at this Examination.
- 1.3 **Persimmon Homes, Ashfield Land** and **Charlton Estates** have now submitted a planning application for up to 1,100 dwellings, on land at Wyck Beck Road/Fishpool Hill. This development is an important early phase of the New Neighbourhood proposals, provides a primary means of access into the wider development site and it is important to make progress now to ensure the timely delivery of housing required in the local area to meet sustainable development objectives.
- 1.4 This Statement provides our response with respect to **Matter 22** only; previous Statements have covered earlier matters which are part of the hearings agenda.
- 1.5 These representations will be elaborated further at the relevant Examination hearings.

Matter 22: Communities of the North Fringe/Cribbs/Patchway/East of Harry Stoke and University of the west of England

Question 1: Is it feasible to accommodate the scale of development envisaged in the North Fringe areas without increasing levels of congestion?

- 1.6 The North Fringe areas are clearly logical locations to accommodate some of the development needs of South Gloucestershire given the various locational advantages which are prevalent and the availability of suitable and deliverable development sites; however, at this stage it is not possible to specifically answer the above question as key parts of the relevant evidence base (transport assessment work) have only recently been completed by the Council, after the publication of the proposed changes document. There are also notable differences between what was proposed previously and what is now part of the emerging transport strategy for the North Fringe.
- 1.7 Notwithstanding the above, as part of pre-application discussions with South Gloucestershire Council, our consultant team has been party to some of the detail behind the Transport Strategy to support the Core Strategy development proposals for the North Fringe. As part of this work South Gloucestershire has developed a Core Strategy model to assess the impact of the proposed development and a package of transport proposals to mitigate impact, and provide a step change in travel options, particularly in relation to public transport.
- 1.8 Our consultant team has not being given sufficient detailed information as yet to complete a thorough audit of the model. Our team has, however, attended briefing sessions which on the face of it suggest and indicate that the model has been developed on the basis of an appropriate methodology for assessing transport needs in the North Fringe. We are not yet in possession of all the facts in relation to the modelling work, particularly in relation to affordability and deliverability, and therefore we are not in a position to confirm the above statement. It is however likely that a significant quantum of new development can be accommodated at the North Fringe and that this will be facilitated by various strategic and local transportation improvements, particularly where the Core Strategy is supporting a 'step change' in public transport provision up to 2026 within South Gloucestershire and neighbouring authorities. This is required to sufficiently mitigate any adverse impact associated with the attraction of private car trips to/from Core Strategy

development proposals. This shift would be due to the delivery of major public transport infrastructure within the North Fringe. The assertion of the modal switch has not been tested, however, it cannot be disputed that the strategic transport package is prioritising public transport improvements as a requirement for not only justifying the Core Strategy development proposals, but also for addressing existing travel movements. This recognises that there is a deficiency in the existing public transport infrastructure. Non delivery of certain measures (such as those major and minor interventions set out within Appendix A to the Cribbs Patchway Delivery Statement, December 2011), would have the potential of adversely affect the overall transport strategy for the area. However, as set out in Examination document RD41 (Review of Strategic Transport Case) the underlying credentials of this location are good and a Neutral effect is predicted in terms of *'whether the impacts of additional traffic to/from the location on key traffic routes can be minimised'*. Non-delivery of specific transport measures represents only one risk factor in planning for sustainable development for the future benefit of South Gloucestershire, and one which can mitigated through alternative measures, if required.

- 1.9 The detail of the final Council strategy and the delivery of all relevant transport mitigation and enhancement measures will be relevant in ultimately answering this specific question; however, as always there is a planning balance to be had and the North Fringe represents a significant opportunity to deliver new development, together with associated improvements in public transportation (and general accessibility) to try and ensure that when necessary development is brought forward it does not make worse existing problems associated with congestion, but seeks to facilitate further improvements (as set out in the Core Strategy), as development progresses. This includes, but is not limited to, the provision of increased population within the North Fringe, which the Council sees as addressing the current imbalance between homes and jobs in this part of the District. Detailed development proposals will, through site specific assessments and contributions to the overall strategy ensure the development and transport strategy for the North Fringe is progressed/facilitated – the promotion of significant levels of new development in the North Fringe is not incompatible with addressing existing problems associated with congestion.

Question 2: Is there scope to utilise Filton Airfield to improve traffic flows in the North Bristol area?

- 1.10 The link through the airfield is seen very much as a highway link that provides for local access to enable distribution of trips and accessibility for trips to and from development on the airfield – it is not seen as a strategic route to link the A38 with the A4018 and this is not something which should be encouraged as part of the wider Cribbs/Patchway development.
- 1.11 However, the development in this area will provide an opportunity for a step change in public transport associated with a cross airfield public transport corridor and the potential extension of the Bus Rapid Transit into the eastern side of the airfield to provide a two way orbital route between Parkway/ Cribbs and the airfield – this will have the impact of a modal shift to public transport for both new development and existing vehicular trips which will assist in improving traffic flows in North Bristol. Local links (for a variety of transport modes) to be created across the Filton Airfield site (and therefore across the New Neighbourhood) will have benefits in terms of the function of the wider area, although development of different parts of the New Neighbourhood are not reliant on such links being created. As set out within the Transportation Assessment that accompanies the recently submitted planning application at Wyck Beck Road/Fishpool Hill, development here can proceed without the benefit of such links, addressing traffic impacts associated with this specific proposal.

Question 3: Is the possible identification of a major sports facility in this area a good use of urban land or are there alternative locations better suited for this purpose?

- 1.12 As set out within our representations there are significant concerns regarding the Council's identification of support for a major sports stadium within Policy CS25, without further specific details relating to its size and location. Such provision (whether on brownfield or greenfield land) will have significant impacts in the local area and represent a significant development in its own right (and as part of the wider North Fringe strategy). The proposal (or any other stadium proposals) should be more specifically defined now within the Core Strategy, or amended to be an aspiration within the supporting text only to be progressed by subsequent DPDs (or other suitable means). In making such provision any stadium developments should only be identified following a thorough assessment (and appraisal) of all available opportunities and having regard to the potential other development that would be 'displaced' by such developments, together with the

identification of suitable additional provision elsewhere. In this regard we are interested to learn whether Gloucestershire County Cricket Club will withdraw previous objections to the Core Strategy, on the basis of redevelopment proposals for their existing ground (with Bristol City) having gained approval.

Question 4: Is there sufficient flexibility in phasing arrangements to ensure housing can be brought forward on other sites in the North Fringe areas if those being developed are not completed to schedule?

- 1.13 Whilst the broad phasing of the CS policies for the North Fringe is logical and allows some flexibility (i.e. completion of existing Local Plan allocations/developments alongside commencement of other parts of the New Neighbourhood) there is insufficient detailed information included with respect to the phasing and delivery of different parts of the now extensive Cribbs/Patchway New Neighbourhood. Whilst this detail may be included within the forthcoming Masterplan SPD, there should be additional guidance relating to phasing and timing of the distinct elements of the New Neighbourhood proposals within the Core Strategy, to aid co-ordination and the timely delivery of necessary development to support the Council's housing and employment land trajectories. This should include relevant cross referencing with the Council's Infrastructure Delivery Plan (which is an essential part of ensuring a sound Core Strategy). In this regard it is noted that the IDP has been updated since June 2010 however it remains insufficiently detailed with respect to phasing, and is out of date with respect to the proposed Cribbs/Patchway New Neighbourhood as there remain various reference to only 1,750 new dwellings. A strong and clear IDP will be important to co-ordinate the delivery of the Cribbs/Patchway New Neighbourhood (as well as other elements of the Core Strategy), and although further detail can be included in subsequent DPDs/SPDs important detail relating to this Core Policy should be clarified now as part of the Core Strategy.

Question 5: Should Policy CS26 be revised to reduce complexity and, if so, how could this be achieved?

- 1.14 Yes the policy should be revised to reduce complexity. This could be achieved by splitting the policy into a number of distinct sections covering the overall vision and principles, followed by any specific detail (where this is necessary as part of the policy). Much of the detail could be omitted to be covered within the anticipated

Masterplan SPD, or referenced only within the supporting text. Some elements are duplicated within other general policies and can be omitted from Policy CS26.

Question 6: Is it realistic to expect the range and type of facilities required can be provided as part of the Cribbs/Patchway New Neighbourhood?

- 1.15 Comments on the range of detailed facilities anticipated by the later parts of Policy CS26 are contained in our representations, which (in summary) states that some are not necessary and/or it is not necessary to include this detail within a core policy (or conversely that insufficient detail, and evidence, has been provided to justify inclusion – i.e. wireless internet network and indoor sports facilities).
- 1.16 It is reasonable and proportionate to expect a development the size of the proposed New Neighbourhood to make appropriate contributions to the provision of new facilities and infrastructure to support the increased local population which will be accommodated; however, the Council's delivery plans and the Masterplan SPD will need to specify with far greater precision the location and specification of such facilities and the mechanisms to deliver these, whilst at the same time retaining flexibility to ensure the viable delivery of development, including delivery of these facilities and contributions towards them.

Question 7: Development of the new neighbourhood East of Harry Stoke is predicated on the provision of the Stoke Gifford Transport link. What implications does this have for delivery of the CS should the link be delayed through lack of funding or for other reasons?

- 1.17 The proposed North Fringe – Hengrove rapid transit link is a key pillar of the Core Strategy; however, that is not to say that should it be delayed or not be deliverable suitable alternative routes and transport provision could not be achieved to ensure the delivery of necessary development elsewhere, i.e. the Cribbs/Patchway New Neighbourhood. Should changing circumstances present themselves then the Council will need to be pro-active in amending its planning policy framework and ensuring that other development provision can be achieved.
- 1.18 Overall the Core Strategy needs to ensure sufficient flexibility to deliver strategic transportation improvements and the total quantum of new homes, employment land and other infrastructure that is required phased over the Core Strategy period, to meet objectively assessed needs and deliver sustainable development in line

with the NPPF. Flexibility is required to respond to changing circumstances if these are presented.

Question 8: Are proposals for revised Green Belt boundaries both to the west of the A4018 and as part of the East of Harry Stoke New Neighbourhood appropriate?

- 1.19 As set out previously with respect to Matter 6 we believe that it would be more appropriate to first consider whether the Council has adequately explored the potential of **non-Green Belt** sites to meet identified and future development needs. This approach would be consistent with the Council's overall strategy given that they remain "*in principle opposed to significantly reducing the Green Belt to accommodate land for housing growth per se*" (SGC Core Strategy incorporating Post-Submission Changes, Paragraph 1.39), and in this regard not include the proposed amendment to the west of the A4018 at this stage.
- 1.20 Given that the Council has sought to limit the impact of new housing development on the Green Belt, it would be entirely logical to firstly undertake a comprehensive review of strategic sites, which are located outside of the Green Belt. This process has not been undertaken.
- 1.21 Instead, the Council has identified two strategic sites for release from the Green Belt ahead of other more appropriate non-Green Belt strategic sites (for example land to the east of Chipping Sodbury). This process is flawed, particularly in the context of the proposed level of growth planned for in the Core Strategy. It would be more appropriate to first allocate sustainable and deliverable non-Green Belt strategic sites. If the number of dwellings required through the Core Strategy were to be increased (as per the prevailing evidence base), it could then be argued that there was a need to consider strategic releases from the Green Belt towards the end of the plan period, which should be based on a comprehensive and thorough review of the Green Belt.

The site identified for release at Haw Wood would effectively be a separate neighbourhood, with the Sustainability Appraisal Report (December, 2011) itself recognising that the "*A4108 is significant barrier to integration of a new development with wider area*". The site also currently fulfils an important function for sports provision. This role will be particularly important to support the early years of the Cribbs/Patchway New Neighbourhood. Should development be needed in this location these constraints should be recognised in its phasing and the release of the site needs to be properly justified by the evidence base.

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